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May 18, 2020

## Via First Class US Mail

The Honorable Jocelyn G. Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, SC 29210

> Re: Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC Docket Number 2020-1-E

Dear Ms. Boyd:

Please find enclosed this firm's Motion for Confidential Treatment and Confidential Direct Testimony and Exhibits of Gregory Lander on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy in the above-reference matter.

Please contact me if you have any questions concerning this filing.

RECEIVE

Sincerely,

/s/ Katherine Lee Katherine Lee Southern Environmental Law Center 525 East Bay Street, Suite 200 Charleston, SC 29403

Telephone: (843) 720-5270

Fax: (843) 414-7039

Attorney for South Carolina Coastal Conservation League and Southern Alliance for Clean Energy

Enclosures KNL/ees

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### STATE OF SOUTH CAROLINA

## BEFORE THE PUBLIC SERVICE COMMISSION

#### **DOCKET NO. 2020-1-E**

	,	
In re: Annual Review of Base Rates	)	MOTION REQUESTING THAT THE
for Fuel Costs for Duke Energy	)	CONFIDENTIAL VERSION OF
Progress, LLC	)	GREGORY LANDER'S DIRECT
	)	TESTIMONY BE TREATED AS
	)	CONFIDENTIAL
	)	

Intervenors South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") hereby move the Public Service Commission of South Carolina to treat as confidential, the version of the Direct Testimony of Gregory Lander marked "confidential."

The confidential version of the testimony references responses Duke Energy Progress, LLC ("DEP") sent to CCL and SACE marked as confidential. A confidentiality agreement CCL and SACE entered into with DEP requires that CCL and SACE "not release any Protected Information to any third parties without the prior written consent of DEP in its sole discretion; provided, however, that the Protected Information may be filed with the Commission under seal." CCL and SACE are therefore requesting that this version of the testimony remain confidential. All confidential information has been designated as such in the confidential version by highlighting and/or by a clearly marked "confidential" heading.

WHEREFORE, CCL and SACE respectfully request that this motion be granted.

This 18<sup>th</sup> day of May, 2020.

# s/ Kurt Ebersbach

Kurt Ebersbach (admitted *pro hac vice*) Southern Environmental Law Center Ten 10<sup>th</sup> Street, Suite 1050 Atlanta, GA 30309 Telephone: (843) 720-5270

Fax: (843) 720-5240

## s/ Katherine Lee

Katherine Lee SC Bar No. 104478 Southern Environmental Law Center 525 East Bay Street, Suite 200 Charleston, SC 29403 Telephone: (843) 720-5270 Fax: (843) 720-5240

Attorneys for South Carolina Coastal Conservation League and Southern Alliance for Clean Energy